



September 5, 2018

Reference No. 038443-15

Ms. Tamara McPeck
Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio
45402

Dear Ms. McPeck:

**Re: Notice of Violation of OAC 3745-9-03(B) and OAC 3745-9-03(C)
Improper Well Maintenance and Abandonment
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This letter provides our responses to the comments contained in your letter dated July 23, 2018 (received by GHD on August 3, 2018), pertaining to the "Well Location and Decommissioning Work Plan" dated June 22, 2018. GHD has prepared this submission on behalf of the Respondents to the Administrative Settlement Agreement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) of the Site, Docket No. V-W-16-C-011 (Respondents). Each Ohio EPA comment is reproduced below followed by GHD's response.

Ohio EPA Comment 1:

The Work Plan states that MW-228 will be decommissioned when possible because it is in an area used by Valley Asphalt for their operational activities, and therefore, cannot be protected from future damage or kept free for future access. However, MW-228 is monitoring vinyl chloride (VC) concentrations in the upper ground water zone (VC detected in MW-228 at 6.3 ug/L) and serves as a permanent monitoring location helping to characterize the trichloroethene (TCE) and benzene plumes located in the northern portion of OU1. Please clarify whether MW-228 can/will be replaced at a nearby location to monitor VC observed in shallow ground water in this area. Ohio EPA strongly believes that a permanent replacement monitoring well be installed in this area if possible and if operational activities on the Valley Asphalt property allow.

GHD Response:

Consistent with our understanding of recent discussions between U.S. EPA and Ohio EPA related to this comment, the potential replacement of MW-228 will be addressed within the RI/FS process, according to the ASAOC between the U.S. EPA and the Respondents.

Ohio EPA Comment 2:

The NOV requested a schedule for locating and repairing/abandoning damaged or buried wells; however, a schedule was not provided in the Work Plan. Please provide a schedule for locating and repairing/abandoning MW-223B and MW-228.



GHD Response:

Regarding MW-223B located on Dayton Power & Light (DP&L) property, GHD's June 22, 2018 submission stated that MW-223B "...has been located by GHD using a metal detector and will be repaired by GHD ... during upcoming RI field activities." Mobilization of GHD's drilling subcontractor to conduct RI drilling and groundwater sampling activities on the DP&L property occurred on August 14, 2018. The subcontractor will complete the MW-223B well repair in September 2018.

Regarding MW-228 located on Valley Asphalt property, GHD's June 22, 2018 submission stated "GHD is in discussions with Valley Asphalt to determine logistics, and it is anticipated that the well decommissioning will be conducted after Valley Asphalt removes the reclaimed asphalt stockpile according to their production schedule." To elaborate further, GHD's understanding is that Valley Asphalt plans to mobilize crushing equipment to their facility in late 2018, to allow them to process the reclaimed material into useable form (for new asphalt production). However, their schedule is dependent on the duration of the current construction season and logistics of mobilizing and operating the crushing equipment. Hence, GHD is unable to determine precise timing for access to the MW-228 area but will continue to work on coordination with Valley Asphalt. GHD will notify the agencies of the schedule for work at MW-228 when possible.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in blue ink that reads "Julian Hayward". The signature is written in a cursive, flowing style.

Julian Hayward

JH/cb/2

cc: (all by pdf) Leslie Patterson, USEPA
 Ken Brown, ITW
 Bryan Heath, NCR
 Wendell Barner, Barner Consulting
 Jim Campbell, EMI
 Larry Silver, LSSH
 Valerie Chan, GHD